

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC, and IRISH
BLUE & GOLD, INC.,

Plaintiffs,

vs.

CURRENEX, INC., GOLDMAN SACHS & CO.
LLC, HC TECHNOLOGIES, LLC, STATE STREET
BANK AND TRUST COMPANY, and JOHN DOE
DEFENDANTS 1-5,

Defendants.

Case No. 1:21-cv-6598

**JOINT STIPULATION AND [PROPOSED] ORDER RE: SCHEDULE FOR FILING
THE AMENDED COMPLAINT AND MEMORANDA OF LAW REGARDING
MOTION TO DISMISS**

1. WHEREAS, on August 4, 2021, Plaintiffs Edmar Financial Company, LLC and Irish Blue & Gold, Inc. (together, “Plaintiffs”) filed their class action complaint (Dkt. No. 1) against Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and John Doe Defendants 1-5 (collectively, “Defendants”);

2. WHEREAS, on August 25, 2021, the Court ordered—pursuant to the parties’ stipulation—that Defendants were to file their motion to dismiss by October 13, 2021, and that Plaintiffs had the option to elect to amend the Complaint by November 12, 2021, and then to meet and confer in good faith with regard to a new schedule (Dkt. No. 14); and

3. WHEREAS, on October 13, 2021, Defendants filed their motion to dismiss (Dkt. No. 33); and

4. WHEREAS, Plaintiffs exercised their option to elect to amend the Complaint on November 12, 2021, and the parties met and conferred regarding a new schedule.

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. Plaintiffs must file their amended complaint by January 6, 2022.
 2. Defendants must file any motions to dismiss by February 25, 2022.
 3. Plaintiffs must file their oppositions to any motions to dismiss by April 8, 2022.
 4. Defendants must file their reply to Plaintiffs' opposition by May 6, 2022.
 5. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the parties or from the Court.
6. Nothing in this order is intended to curtail the rights under the Federal Rules that might otherwise exist absent this agreement.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

DATED: New York, New York
November 18, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Daniel L. Brockett

Daniel L. Brockett
Steig D. Olson
Christopher M. Seck
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Fax: (212) 849-7100
danbrockett@quinnmanuel.com
steigolson@quinnmanuel.com
christopherseck@quinnmanuel.com

Jeremy D. Andersen (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Fax: (213) 443-3100
jeremyandersen@quinnmanuel.com

RUDDY GREGORY, PLLC
Mark Ruddy
1225 15th Street NW
Washington, DC 20005
Telephone: (202) 797-0762
Fax: (202) 318-0543
mruddy@ruddylaw.com

*Counsel for Plaintiffs and the Proposed
Class*

ROPES & GRAY LLP

/s/ Gregg L. Weiner

Gregg L. Weiner
Alexander B. Simkin
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-5000
Fax: (212) 596-9090
gregg.weiner@ropesgray.com
alexander.simkin@ropesgray.com

Robert G. Jones
800 Boylston Street
Boston, MA 02199
Telephone: (617) 951-7000
Fax: (617) 951-7050
robert.jones@ropesgray.com

Samer Musallam
2099 Pennsylvania Avenue NW
Washington, DC 20006
Telephone: (202) 508-4600
Fax: (202) 508-4650
samer.musallam@ropesgray.com

*Counsel for Defendants Currenex, Inc. and
State Street Bank and Trust Company*

KATTEN MUCHIN ROSENMAN LLP

/s/ Peter G. Wilson

Peter G. Wilson
Christian T. Kemnitz
Elliot M. Bacon
525 W. Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
peter.wilson@katten.com
christian.kemnitz@katten.com
elliott.bacon@katten.com

*Counsel for Defendant HC
Technologies, LLC*

CLEARY GOTTLIEB STEEN & HAMILTON
LLP

/s/ Carmine D. Boccuzzi Jr.

Carmine D. Boccuzzi Jr.
Rishi N. Zutshi
One Liberty Plaza, 1 Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000
cboccuzzi@cgsh.com
rzutshi@cgsh.com

*Counsel for Defendant Goldman Sachs & Co.
LLC*